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January 12, 2016

RCRA Branch (LR-8J)
U.S. EPA, Region 5
77 West Jackson Boulevard
Chicago, Illinois 60604

Attention: Mr. Brian Kennedy

Reference: Quarterly Progress Report
Consent Agreement and Final Order (CAFO)
Docket No. RCRA-05-2014-0013
Project No. 242933.0000

Dear Mr. Kennedy:

TRC Environmental Corporation (TRC), is pleased to submit, on behalf of Canton Drop Forge (CDF), the attached Progress Report for the **Fourth Quarter 2015**, as agreed to in the Consent Agreement and Final Order (CAFO) journalized by the United States Environmental Protection Agency (U.S. EPA) on September 18, 2014.

Should you have any questions regarding the enclosed document, please contact me at (216) 344-3072 or via e-mail kteuscher@trcsolutions.com.

Sincerely,

TRC Environmental Corporation

Kathleen R. Teuscher
Risk Assessor/Project Manager

cc: Erik Hagen – DERR CO, Ohio EPA
Don Vogel – DERR CO, Ohio EPA
Ron Shadrach – DHWM, NEDO
Eaton Weiler – U.S. EPA, Region 5
Brad Ahbe – CDF

PROGRESS REPORT – Fourth Quarter 2015
Canton Drop Forge, Inc.
Canton, Ohio
U.S. EPA ID No. OHD00446S142

A. IDENTIFICATION OF FACILITY AND ACTIVITY

This quarterly Progress Report is required by the Consent Agreement and Final Order (CAFO), effective date September 18, 2014, between the U.S. EPA Region 5 and Canton Drop Forge, Inc. (CDF). The CAFO is for the CDF Facility located at 4575 Southway Street SW, Canton, Ohio. At the request of CDF, TRC Environmental Corporation (TRC) has prepared this Progress Report. As required by Paragraph 47 of the CAFO, this Progress Report discusses the work performed during the previous quarter, the data collected, and any problems encountered. This Report also includes a progress update on tasks specified on the project schedule.

B. STATUS OF WORK AT THE FACILITY AND PROGRESS DURING THE QUARTER

The CDF Ponds Closure Plan (Closure Plan), dated September 8, 2014, was approved by Ohio EPA on October 29, 2014. Implementation of the Closure Plan and related tasks are listed below.

- (i) The status of the removal of oil-water emulsion from Pond Nos. 1 and 2.

All liquids from Pond No. 1 were removed during the last quarter of 2014, prior to remediation of the solids in Pond No. 1. Remediation and restoration of Pond 1 was completed during the first quarter of 2015.

Installation of the hook up to the City sewer system was completed October 6, 2015 and water unable to be treated or reused is discharged to the Stark County Sanitary Sewer with ultimate discharge to the City of Massillon's Waste Water Treatment Plant (WWTP). Dewatering of Pond No. 2 was completed in mid-October.

- (ii) The status of the excavation of oil-impacted bottom material from Pond Nos. 1 and 2.

CDF completed installation of the large permanent stormceptor in early October which required additional trenching and sloping. Although the stormceptor is not in the footprint of the unit, some of the excavated soil was staged within the work area of Pond No. 2 prior to excavation to be utilized to solidify material from Pond No. 2 intended for disposal. TRC sampled this soil for waste characterization on October 14, 2015. A figure with the approximate sample locations and the analytical results are summarized in Attachment 1. Samples included the staged soils and due to the lower water level also included exposed soils in or adjacent to the pond unit. All results met disposal criteria.

Once dewatering was complete, excavation of oil-impacted bottom material from Pond No. 2 was initiated. By mid-November initial pond material was removed away from a portion of the north edge of Pond No. 2 to the extent reasonably possible. Oil-impacted bottom material removed from Pond No. 2 was transported for off-site disposal at Everclear. Documentation of waste transport and disposal of the solid materials removed from the Pond No. 2 excavation has not yet been received from the disposal facility and will be included with the next quarterly report. Removal progressed eastward (or clockwise) around the perimeter shifting the excavated material towards

the center of the pond for staging and ultimately removal. Observations from site visit performed by Ohio EPA on November 13, 2015 are provided in Attachment 2 and summarized below:

- **Unit Boundary (North Side)** – Ohio EPA agreed that the location observed in the northwest corner near the north bank was an approximate unit limit although minor streaking remains at depth allowing EMS (CDF contractor) a baseline to move work laterally.
- **Unit Boundary (West Side)** – Impacted material remained on the slope in the area in the northwest corner near the roadway and was to be removed to the extent possible to maintain the integrity of the access road.
- **Debris and Solid Waste** – Any oil-impacted debris and/or solid waste must be removed as part of the pond unit and included in the characterization process.
- **Containers** – A crushed drum was identified near the upper edge of the pond unit in the northeast area. Contents included black material and appeared to be graphite sediment. Additional containers had not been identified at the time of the visit; however, if similar containers are identified CDF was instructed to notify Ohio EPA.

Attachment 3 includes photos of the west and northwest portion of Pond 2 on November 25, 2015. Material was staged for off-site transport in early December. Ohio EPA made subsequent site visits on December 10 and 22, 2015. Observations from these visits are also included in Attachment 2 and summarized below:

- Removal to the north and west side walls are nearly complete. Clay layers exposed in the lower portion of the walls appear to have dark stained bands possibly due to historical oil management practices.
- Solid waste material was observed in small sections near the surface in the northwest corner of the pond unit with some disturbed soils below. Apparent lime spoils were noted in the upper north central wall area.
- A gray clay layer observed in the northwest corner appears to run out at different locations. Water with some dark oil was observed immediately below the clay layer (~ 16-18 ft. bgs). Nearby well (MW-10) is screened at 45-60 ft. bgs. Subsequent removal activities seem to have removed the source.
- A former pipe was identified in the upper middle, west wall. Further extended piping was not observed in the excavation.
- A test cut was made in the gray clay bottom of the excavation in the southwest corner, immediately north of the access ramp. Oil was observed in the clay fissures to at least 18 inches beneath the surface. Ohio EPA requested an additional six inches be removed.
- The origin of the piping near the pump house located at the east end of Pond No. 2 should be investigated and pipes should be emptied, properly plugged or terminated, along with removal of all visually associated oil and impacted material.
- The south side of Pond No. 2 was only partially exposed. Minor waste debris was visible. Further removal is in progress.

(iii) The status of the excavation of oil-affected soils adjacent to Pond Nos. 1 and 2.

Excavation of oil-impacted material adjacent to Pond No. 2 is being performed in conjunction with removal of bottom material to the extent reasonably possible (e.g., limitation for continued access during removal process). This material is being disposed with the bottom material described above, and the volumes were not tracked separately. Documentation of waste transport and disposal of the

solid materials removed from the Pond No. 2 excavation has not yet been received from the disposal facility and will be included with the next quarterly report.

(iv) The status of confirmatory sampling (as applicable).

No confirmatory sampling was performed at close of the fourth quarter. It is anticipated that Ohio EPA will perform a visual inspection of Pond No. 2 during January 2016 to provide concurrence that all residuals within the Pond No. 2 unit have been removed as described in the approved Closure Plan.

(v) The status of backfilling and restoration of Ponds Nos. 1 and 2.

Backfilling and restoration of Pond No. 2 will be completed following concurrence with Ohio EPA that all residuals within Pond No. 2 have been adequately removed. No further backfilling or restoration of Ponds Nos. 1 and 2 occurred during this quarter.

C. PROBLEMS ENCOUNTERED DURING THE QUARTER

CDF was notified by Ohio EPA on October 27, 2015 that they had received dust complaints. It was presumed that the dust was due to the mixing of Calciment® in the soil. Calciment® is used as a drying agent for solidification of the bottom material prior to off-site disposal.

D. ACTIONS TAKEN TO RECTIFY PROBLEMS

Calciment® has the consistency of fine powder and traditional dust control methods (e.g., wetting) contradict the objective of the product as a drying agent. CDF was advised to note wind velocity and direction to implement adequate control measures. Adjustments to operations were made accordingly for dust and odors as needed. The provider contracted by CDF utilizes a cyclone attachment on the vehicle to minimize the Calciment dust. Photos are included in Attachment 4. CDF monitored the entire transfer operation on October 28, 2015 and minimal dust was observed. Specifically, dust did not travel south towards Southway Street or the neighboring homes across the street. Photos are included in Attachment 4. Per a phone call with Ohio EPA on October 30, 2015, CDF reviewed the current status of operations and the matter appeared to be resolved. Ron Jones of the Canton City Health Department visited CDF on October 30, 2015. CDF continues to work with the neighbors to maintain compliance and minimize the dust.

E. PROJECT SCHEDULE

Remediation of Pond No. 2 was initiated mid- to late October following completion of the sanitary sewer connection and dewatering of the pond. The project schedule and progress report are presented below by task:

Item	Task	Description of Status
1	Consent Agreement and Final Order U.S. EPA Docket No. RCRA-05-2014-0013	Effective date 9/18/2014.
2	Closure Plan Submittal	Received by Ohio EPA on September 9, 2014. Approved October 29, 2014.

Item	Task	Description of Status
3	Agency Review and 30-Day Public Notice Period	Submitted for public comment period ending October 17, 2014. Closure Plan approved October 29, 2014.
4	Installation/Implementation of Upgraded Oil Water Separator (OWS) System	Construction complete and the system is operational.
5	Contractor Procurement/Mobilization (including 10-Day Notification to Ohio EPA prior to mobilization)	Kick-off meeting held at CDF on November 19, 2014. Attendees included CDF, Ohio EPA, and TRC Environmental. The meeting served as the 10-day notification to Ohio EPA. Environmental Management Specialists, Inc. (EMS) was procured through CDF as the contractor to perform the excavation. TRC is performing oversight.
6	Pond 1 Remediation: - Dewatering, Excavation, Disposal - Visual Inspection (CDF/Ohio EPA) and Verification of Completion	Pond 1 remediation was initiated following the above 10-day notification. Dewatering, excavation, and disposal were near completion as of the close of the fourth quarter 2014, with removal of the bottom clay liner overlapping into the first quarter of 2015. Visual inspection by Ohio EPA to verify completion was performed January 20, 2015.
7	Pond 1 Backfill, Installation of Clay Liner	Pond 1 was backfilled late January 2015 and installation of the clay liner immediately followed.
8	Pond 2 Remediation: - Dewatering, Excavation, Disposal - Visual Inspection (CDF/Ohio EPA)	Initial dewatering began in September 2015 with Pond 2 water being treated and recycled for reuse within the CDF facility. Construction for the sewer connection is currently complete. Therefore, further dewatering and subsequent remediation of Pond No. 2 was initiated in the fourth quarter 2015.
9	Pond 2 Installation of Clay Liner	To be implemented following completion of previous tasks.
10	Closure Certification Document (60 days of completion of the closure activities)	To be completed following conclusion of previous tasks.
11	Quarterly Progress Reports	Initiated 3 rd quarter 2014.

ATTACHMENT 1

WASTE CHARACTERIZATION DOCUMENTATION

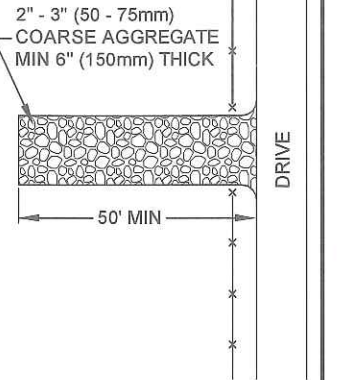
Dwg Size: 1.00 Mb
Plot Date: January 11, 2016
Plot Time: 11:38 AM
Attached Xrefs:
CDF Entire Site 02;
Layout: Pond 2

J:\1_TRC\Canton Drop Forge\242933\000001\1_RCRA Closure Pond 2\242933.0000.01.00.dwg
Drawing Name: STEHLE, DIANA H
Drawing Plot Scale: 0.386863



NOTES:

1. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT TRACKING OF SEDIMENT ON TO PUBLIC RIGHT-OF-WAY, OR ROSS STREET. THIS MAY REQUIRE TOP DRESSING. REPAIR AND / OR CLEANOUT OF ANY MEASURES USED TO TRAP SEDIMENT.
2. WHEN NECESSARY, WHEELS SHALL BE CLEANED AT DECON PAD WITH HIGH PRESSURE WATER.



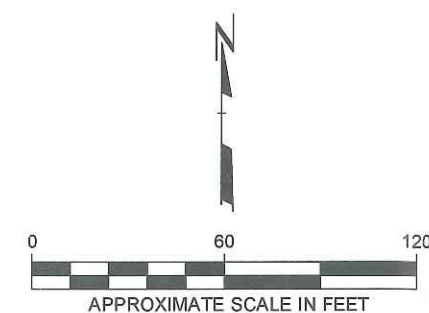
DETAIL FOR WORK AREA EXIT

LEGEND

	PROPERTY BOUNDARY		POND UNIT
	WORK AREA		GRAVELLED TRUCK LOADING CORRIDOR (SEE NOTE 4)
	WORK AREA EXIT (SEE INSET)		AREA OF CONTAMINATION LIMITS
	WORK AREA GATED ENTRANCE		EXISTING MONITORING WELL
	EXISTING MONITORING WELL		WASTE CHARACTERIZATION SAMPLE LOCATIONS
	EXISTING MONITORING WELL		

NOTES

1. THE EXTENT OF THE POND UNITS ARE BASED ON THE POND BANKS, AS DETAILED IN AVAILABLE AS-BUILT DOCUMENTATION, AND INCLUDES THE UNDERLYING WASTE, POND LINERS, BIOCELL, ETC.
2. THE AREA OF CONTAMINATION LIMITS DEFINES THE LIMITS FOR EQUIPMENT AND VEHICLE POSITIONING, WASTE LOADING FOR TRANSPORT, AND DECONTAMINATION PROCEDURES.
3. AERIAL PHOTO FROM BING MAPS, DATED 2012.
4. INSTALL CRUSHED ROAD GRAVEL (ODOT #2 GRAVEL; 1-1/2 TO 2-1/2 INCH) TO MINIMIZE RUTTING AND MUD TRACKING THROUGH THE WORK AREA. INSTALL ROAD GRAVEL ALONG OTHER PORTIONS OF THE TRUCKING ROUTING AS NECESSARY, AND AS DIRECTED BY OWNER.



PROJECT: CANTON DROP FORGE CANTON, OHIO			
TITLE: POND NO. 2 WASTE CHARACTERIZATION SAMPLE LOCATIONS			
DRAWN BY: DGS	SCALE: AS INDICATED	PROJ. NO. 242933.0000.01	FILE NO. 242933.0000.01.00.dwg
CHECKED BY: KT	DATE PRINTED:	FIGURE 1	
APPROVED BY: -	DATE: JANUARY 2016		

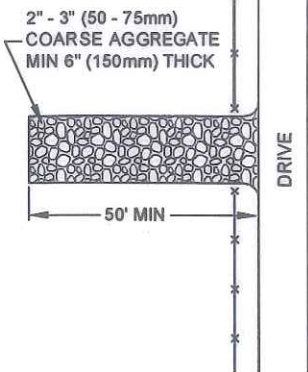


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NOTES:

1. THE ENTRANCE SHALL BE MAINTAINED IN A CONDITION THAT WILL PREVENT TRACKING OF SEDIMENT ON TO PUBLIC RIGHT-OF-WAY, OR ROSS STREET. THIS MAY REQUIRE TOP DRESSING, REPAIR AND / OR CLEANOUT OF ANY MEASURES USED TO TRAP SEDIMENT.
2. WHEN NECESSARY, WHEELS SHALL BE CLEANED AT DECON PAD WITH HIGH PRESSURE WATER.



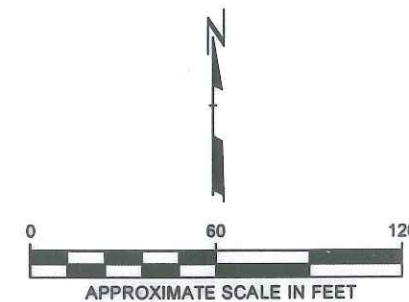
DETAIL FOR WORK AREA EXIT

LEGEND

- | | | | |
|-----------|----------------------------|-----------|---|
| — — — — — | PROPERTY BOUNDARY | ○ | POND UNIT |
| - - - - - | WORK AREA | - - - - - | GRAVELLED TRUCK LOADING CORRIDOR (SEE NOTE 4) |
| ← | TRUCK ROUTE (SEE NOTE 4) | - - - - - | AREA OF CONTAMINATION LIMITS |
| ▨ | WORK AREA EXIT (SEE INSET) | ● | EXISTING MONITORING WELL |
| □ | WORK AREA GATED ENTRANCE | | |

NOTES

1. THE EXTENT OF THE POND UNITS ARE BASED ON THE POND BANKS, AS DETAILED IN AVAILABLE AS-BUILT DOCUMENTATION, AND INCLUDES THE UNDERLYING WASTE, POND LINERS, BIOCELL, ETC.
2. THE AREA OF CONTAMINATION LIMITS DEFINES THE LIMITS FOR EQUIPMENT AND VEHICLE POSITIONING, WASTE LOADING FOR TRANSPORT, AND DECONTAMINATION PROCEDURES.
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4. INSTALL CRUSHED ROAD GRAVEL (ODOT #2 GRAVEL; 1-1/2 TO 2-1/2 INCH) TO MINIMIZE RUTTING AND MUD TRACKING THROUGH THE WORK AREA. INSTALL ROAD GRAVEL ALONG OTHER PORTIONS OF THE TRUCKING ROUTING AS NECESSARY, AND AS DIRECTED BY OWNER.



PROJECT: CANTON DROP FORGE CANTON, OHIO			
TITLE: POND 2 UNIT CONCEPTUAL LAYOUT			
DRAWN BY: DGS	SCALE: AS INDICATED	PROJ. NO. 216406.0000.01	FIGURE 4-2
CHECKED BY: KT	DATE PRINTED:	FILE NO. 216406.0000.01.01H.dwg	
APPROVED BY: KT			
DATE: SEPTEMBER 2015			
TRC		1382 West Ninth Street, Suite 200 Cleveland, OH 44113 Phone: 216.344.3072 Fax: 216.344.3073	

Canton Drop Forge

Project No. 242933.0000

Analytical Group	Chemical	Regulatory Limit ¹	SR-WC-1 240-56596-1 10/14/2015	SR-WC-2 240-56596-2 10/14/2015	SR-WC-3 240-56596-3 10/14/2015	SR-WC-4 240-56596-4 10/14/2015	SR-WC-5 240-56596-5 10/14/2015
GENERAL CHEM	CORROSIVITY BY PH SU	<2 or >12.5	12.5	12.5	8.44	7.98	8.01
GENERAL CHEM	CYANIDE, TOTAL MG/KG	-- ²	0.65 U	0.62 U	0.6 U	0.54 U	0.57 U
GENERAL CHEM	FLASHPOINT DEGREES F	≥ 140 °F	>200	>200	>200	>200	>200
GENERAL CHEM	FREE LIQUID NONE	-- ³	CNF	CNF	CNF	CNF	CNF
GENERAL CHEM	SULFIDE MG/KG	-- ²	50	34 J	37 U	36 U	41
METALS (TCLP)	ARSENIC-TCLP MG/L	5	0.021 J	0.015 J	0.0085 J	0.006 J	0.0068 J
METALS (TCLP)	BARIUM-TCLP MG/L	100	0.47 J B	0.62 J B	1.3 J	0.47 J	0.53 J
METALS (TCLP)	CADMIUM-TCLP MG/L	1	0.001 J	0.0023 J	0.001 J	0.002 J	0.0014 J
METALS (TCLP)	CHROMIUM-TCLP MG/L	5	0.0036 J B	0.0029 J B	0.0022 J	0.0026 J	0.0032 J
METALS (TCLP)	LEAD-TCLP MG/L	5	0.5 U	0.5 U	0.0021 J	0.5 U	0.5 U
METALS (TCLP)	MERCURY-TCLP MG/L	0.2	0.00051 J	0.002 U	0.002 U	0.002 U	0.002 U
METALS (TCLP)	SELENIUM-TCLP MG/L	1	0.014 J B	0.011 J B	0.25 U	0.25 U	0.25 U
METALS (TCLP)	SILVER-TCLP MG/L	5	0.0041 J	0.5 U	0.5 U	0.5 U	0.5 U
PCB AROCLORS	AROCLOR 1016 UG/KG	50,000	--	420 U	41 U	--	--
PCB AROCLORS	AROCLOR 1221 UG/KG		--	420 U	41 U	--	--
PCB AROCLORS	AROCLOR 1232 UG/KG		--	420 U	41 U	--	--
PCB AROCLORS	AROCLOR 1242 UG/KG		--	420 U	41 U	--	--
PCB AROCLORS	AROCLOR 1248 UG/KG		--	420 U	41 U	--	--
PCB AROCLORS	AROCLOR 1254 UG/KG		--	420 U	41 U	--	--
PCB AROCLORS	AROCLOR 1260 UG/KG		--	160 J	25 J	--	--
SEMI-VOLATILE (TCLP)	1,4-DICHLOROBENZENE-TCLP MG/L	7.5	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2,4,5-TRICHLOROPHENOL-TCLP MG/L	400	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2,4,6-TRICHLOROPHENOL-TCLP MG/L	2	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2,4-DINITROTOLUENE-TCLP MG/L	0.13	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	2-METHYLPHENOL-TCLP MG/L	200	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	3 & 4 METHYLPHENOL-TCLP MG/L	200 ⁴	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBENZENE-TCLP MG/L	0.13	0.0008 U	0.0008 U	0.0008 U	0.0008 U	0.0008 U
SEMI-VOLATILE (TCLP)	HEXACHLOROBUTADIENE-TCLP MG/L	0.5	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	HEXACHLOROETHANE-TCLP MG/L	3	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	NITROBENZENE-TCLP MG/L	2	0.004 U	0.004 U	0.004 U	0.004 U	0.004 U
SEMI-VOLATILE (TCLP)	PENTACHLOROPHENOL-TCLP MG/L	100	0.016 U	0.016 U	0.016 U	0.016 U	0.016 U
SEMI-VOLATILE (TCLP)	PYRIDINE-TCLP MG/L	5	0.004 U	0.004 U	0.004 U	0.0042 B	0.0042 B
VOLATILES (TCLP)	1,1-DICHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	1,2-DICHLOROETHANE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	2-BUTANONE (MEK)-TCLP MG/L	200	0.25 U	0.12 J	0.25 U	0.25 U	0.25 U
VOLATILES (TCLP)	BENZENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CARBON TETRACHLORIDE-TCLP MG/L	0.5	0.025 U *	0.025 U *	0.025 U *	0.025 U *	0.025 U *
VOLATILES (TCLP)	CHLOROBENZENE-TCLP MG/L	100	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	CHLOROFORM-TCLP MG/L	6	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TETRACHLOROETHENE-TCLP MG/L	0.7	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	TRICHLOROETHENE-TCLP MG/L	0.5	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U
VOLATILES (TCLP)	VINYL CHLORIDE-TCLP MG/L	0.2	0.025 U	0.025 U	0.025 U	0.025 U	0.025 U

CNF = Contains No Free Liquid

U = not detected at the reported limit

B = Analyte was also detected in the associated laboratory blank

J = Estimated value; positive detection identified below the laboratory reporting limit

¹ As presented in 40 CFR Part 261 Subpart C.

² A waste is considered hazardous if it is a cyanide- or sulfide-bearing waste which, when exposed to pH conditions between 2 and 12.5 can generate toxic gases, vapors or fumes in a quantity sufficient to present a danger to human health or the environment. The EPA issued interim guidance in July 1985 describing threshold levels for cyanide- and sulfide-bearing wastes and analytical methods for evaluating such wastes. EPA withdrew the July 1985 guidance in April 1998. Therefore, EPA does not recommend use of the interim threshold levels or methods to determine whether a waste is hazardous based on the characteristic of reactivity and intends to remove the guidance threshold levels and the laboratory methods from Chapter Seven of SW-846.

³ A specified amount of material is placed in a paint filter. If any portion of the material passes through and drops from the filter within the 5 minute test period, the material is deemed to contain free liquids. Waste containing free liquids may be placed in a landfill if the landfill has a liner and leachate collection and removal system that meet the requirements of § 264.301(a) or the liquid waste or waste containing free liquids is treated or stabilized, chemically or physically (e.g., by mixing with a sorbent solid), so that free liquids are no longer present.

⁴ If o-, m-, and p-Cresol concentrations cannot be differentiated, the total cresol (D026) concentration is used. The regulatory level of total cresol is 200 mg/l.

ATTACHMENT 2
OHIO EPA CORRESPONDENCE

Teuscher, Kathleen

From: Ronald.Shadrach@epa.ohio.gov
Sent: Thursday, November 19, 2015 4:41 PM
To: Teuscher, Kathleen; Sean Denman (sdenman@Cantondropforge.com)
Cc: Dustin Azbell (dazbell@emsonsite.com) (dazbell@emsonsite.com); Pulliam, Ryan; Harry.Courtright@epa.ohio.gov; John.Palmer@epa.ohio.gov; Erik.Hagen@epa.ohio.gov
Subject: Canton Drop Forge- Ohio EPA Site Visit 11/13/2015

Good Afternoon,

Below are Findings to a site visit made of **Pond #2**, November 13, 2015 at Canton Drop Forge.

The following were present:

Ronald Shadrach, Ohio EPA
Sean Denman, CDF
Ryan Pulliam, TRC
Dustin Azbell, EMS

Unit Boundary – North Side Pond #2

CDF requested concurrence of the used oil unit boundary in Pond #2 on this face. Ohio EPA agreed that the location observed on the north bank near the northwest corner was at an approximate unit limit although some minor streaking did remain at depth. This gives EMS a baseline to begin working laterally. As work progresses either direction laterally it could be found that more may need removed. Keep in mind the area the party observed at the time was little more than an excavator bucket width size.

Unit Boundary West (roadway) Side

On the area along the roadway (northwest corner) EMS was to remove a few more feet as oil remained heavy on this slope. There was concern that to protect the roadway, that little more could be removed here. Aerial photos appear to indicate that at the road location did not appear to change historically through time so that the used oil should run out quickly in this direction. This would be looked at this further next week (this week).

Debris and Solid Waste

Where debris/solid waste debris is encountered that is oily, it must be removed, or removed if needing to be moved as part of the pond unit. This material may be used in the bulking process to reduce the use of calciment. The material (all waste generated) should be included in the characterization process. CDF should document and sample accordingly as needed to satisfy VAP requirements those materials left behind at the unit boundary. CDF/EMS reported that they would leave it (solid waste debris) if they did not have to remove it.

Containers

There was observed one crushed 55- gallon drum present at the upper edge of the Pond 2 unit in the northeast area. It contained partial contents of a black material that appeared to have a look of graphite impregnated grease. CDF/EMS reported not encountering other small or large containers. If several drums are encountered or a cache of drums or other containers are seen, OhioEPA should be notified immediately. These could require a plan amendment or certain field changes made to ensure proper management, characterization and disposal. The area should be marked and secured as necessary in the interim. All materials sent offsite need to be properly characterized and disposed.

Lastly, Sean Denman reported that the Neighbor Complaint relative to the use of calciment appears to be resolved and CDF will execute a final remedy with neighbors once all work is completed. Operations are being conducted in compliance with the local health and air quality board per the site visit that was made to CDF, per Sean. The work executed to date appears in compliance with the scope of the approved work plan.

Ronald Shadrach

Site Coordinator,
Division of Environmental Response and Revitalization
Northeast District Office
2110 East Aurora Road, Twinsburg, Ohio 44087
Ph: 330-963-1146
Fax: 330-487-0769
Ron.Shadrach@epa.ohio.gov



Teuscher, Kathleen

From: Ronald.Shadrach@epa.ohio.gov
Sent: Wednesday, December 30, 2015 3:47 PM
To: Sean Denman (sdenman@Cantondropforge.com); Teuscher, Kathleen; Pulliam, Ryan
Cc: Erik.Hagen@epa.ohio.gov; Harry.Courtright@epa.ohio.gov; John.Palmer@epa.ohio.gov; Brad Ahbe (bahbe@CANTONDROPPFORGE.COM)
Subject: Update - Canton Drop Forge December 2015

Status of Canton Drop Forge Pond #2 Closure by Removal from recent site visits (12/10/2015 and 12/22/2015) by Ohio EPA, DERR-NEDO:

- The north and west side wall removals were virtually complete. Clay layers exposed in the lower side walls appear to have a dark stained band that may be discolored from the oil management.
- Some small sections of solid waste material were visible near the surface in the northwest corner. Some disturbed/discolored soils occurred below these areas. There was also a layer of apparent lime spoils in the upper north central wall area.
- In the NW corner bottom area, a gray clay layer became a gravelly, sand that was oily. Dustin Azbell, EMS said that the clay layer runs out at different places. Whether the clay occurs this way naturally or was dredged and removed at one time, is unknown. Ground water was encountered just below the clay about 16-18 feet below the ground surface in this area. Some dark oil accumulated on the water. Later removal work, appeared to have removed much of this source but the final removal status needs confirmed. Nearby this location is monitoring well MW-10. This well is screened 45-60 feet below the ground surface and does not appear to monitor the apparent upper, shallow ground water zone.
- In the upper middle, west side wall, a former pipe appears to have at one time discharged/connected to Pond 2. Dustin Azbell, EMS, reported that a piece of wood was in the hole on opening the excavation but no piping was present. This location is a preferred path for surface seepage through the fill material.
- In the SW corner, just north of the temporary EMS access ramp, is a gray clay at the bottom of the excavation. In a test cut of this clay, oil was observed to penetrate clay fissures to at least 18 inches below the surface. Ohio EPA requested that an additional upper 6 inches of this area be removed. This would eliminate the heaviest accumulation in the fissures.
- Near the pump house, east end of Pond 2, there are two pipes near the upper surface extending into the pond from a northeast direction. Oily soil yet surrounded this area. The smaller pipe was an approximate two inch diameter pipe that had oil laying in it. By the tear and opening in the pipe, it may have been made of a softer material than steel (i.e. lead). The other pipe was a four to six inch diameter pipe and was connected by flanges (i.e. steel). These pipes aligned in similar directions and may not be debris. These pipes should be traced to an origin, emptied, properly plugged/terminated or removed with all visual associated oil sources removed.
- The south side of Pond 2 (parallel to Southway St.) was only slightly exposed at the eastern end, near the pump house. Some minor solid waste debris was visible near the upper surface in this area. The extent of removal needed along this perimeter was yet unclear.

It is recommended that Canton Drop Forge begin to evaluate and document the conditions remaining after closure by removal and evaluate for confirmation/delineation samples as may be needed to address the requirements of the Voluntary Action Program.

Ron Shadrach
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ATTACHMENT 3
POND NO. 2 PHOTOS


Attachment 3 Photograph Log



Photo 1: West / Northwest Pond 2 (11/25/15)



Photo 2: West / Northwest Pond 2 (11/25/15)

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	1 of 2	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	


Attachment 3 Photograph Log



Photo 3: West / Northwest Pond 2 (11/25/15)



Photo 4: West / Northwest Pond 2 (11/25/15)

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	2 of 2	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	

ATTACHMENT 4
DUST CONTROL PHOTOS


Attachment 4 Photograph Log



Photo 1: Caliment Application (10/28/15)



Photo 2: Caliment Application (10/28/15)

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
242933	Canton Drop Forge	1 of 1	Canton Drop Forge	4575 Southway Street SW, Canton, Ohio	